

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a)	Case No. 16-cv-1054 (DTS)
Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY,)	
an Indiana corporation, and ACE)	
AMERICAN INSURANCE)	
COMPANY, a Pennsylvania)	
corporation,)	
)	
Defendants.)	

PLAINTIFF FAIR ISAAC CORPORATION’S DEPOSITION DESIGNATIONS
RE: LAWRENCE WACHS

Plaintiff Fair Isaac Corporation (“FICO”), by and through its undersigned counsel, hereby makes the following designations of deposition testimony from the Deposition of Lawrence Wachs. Defendants’ objections to FICO’s designations and counter designations, as well as FICO’s objections to Defendants’ counter designations are also included in the following set forth below. FICO makes these disclosures without prejudice to amending or supplementing the disclosures in the future, if necessary, including but not limited to further reducing the designations set forth below. FICO reserves the right to use any deposition testimony, whether designated or not, for purposes of cross-examination, impeachment, and/or rebuttal. FICO reserves the right to designate additional deposition testimony or call any witness for live testimony in response to any of Defendants’ deposition designations or for any other reason. FICO’s

designations include all exhibits that are referenced in the specified pages and lines, whether or not such exhibits are separately identified. FICO reserves the right to use any deposition testimony designated by Defendants.

Plaintiff's Deposition Designations – Lawrence Wachs (February 26, 2019)	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections	Plaintiff's Counter- Counter Designations
5:18-20		6:6-8	N/A	
7:13-24		7:25-8:15	N/A	
8:16-18				
8:24-9:5		9:6-22	N/A	
10:23-11:4			N/A	
12:4-14		13:2-5		
13:6-11		13:12-22	N/A	
13:23-14:7				
14:15-22				
17:14-18:17		18:18-19:1 19:13-20:21 21:17-20	N/A O (Work Product) O (Work Product)	
24:5-13		24:14-21	N/A	
24:22-28:20	AF, EX, LF, O, PK, S	28:21-30:24		
30:25-32:7		32:8-34:16 34:25-35:17		
35:18-36:16				
37:6-38:2		38:6-13	N/A	
38:14-40:17		40:18-41:22		
41:23-42:2				
42:7-10				
43:11-44:2				
61:5-62:12	EX	59:7-60:4 60:7-15		
62:17-63:3	EX	63:4-7	N/A	
63:12-64:8		64:9-12	N/A	

Plaintiff's Deposition Designations – Lawrence Wachs (February 26, 2019)	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections	Plaintiff's Counter- Counter Designations
		64:15-25		
67:4-12		66:8-24; 67:3; 67:15-16	N/A	
67:19-68:7		68:10-11	N/A	
68:18-70:7		70:8-11	N/A	
71:6-72:20				
73:17-74:5		73:16; 74:6-9	N/A	
74:10-21		74:22-75:3	N/A	
75:4-18		75:19-76:10	N/A	
76:11-13		76:14-77:14	N/A	
77:15-78:12		78:13-79:24	N/A	
81:3		80:16-81:2	N/A	
81:5-14				
82:11-83:11		83:12-14	N/A	
83:15-84:20		84:21-85:6	N/A	
85:7-86:25		87:1-16	N/A	
87:17-88:12				
88:15-89:2		89:3-24; 92:6-93:10; 94:10-20; 94:25-95:24; 96:11-13; 96:16-97:7; 98:21-99:16; 99:19-23; 103:20-106:3; 106:23-107:12; 107:19-108:18; 113:2-114:8; 114:18-115:6; 115:18; 115:20-21	N/A N/A R R R R N/A N/A N/A N/A N/A R N/A N/A	
115:19		115:20-21	N/A	
115:22-116:5		116:6-15	N/A	
116:16-119:12				
116:25-118:12	S			

Plaintiff's Deposition Designations – Lawrence Wachs (February 26, 2019)	Defendants' Objections	Defendants' Counter Designations	Plaintiff's Objections	Plaintiff's Counter- Counter Designations
118:13-119:12				
126:15-127:6		132:16-19; 133:8-134:25; 135:13-137:3; 137:10-138:3; 139:9-14; 140:10-11; 140:21-25; 141:1-25; 142:7-143:11; 146:7-147:9; 147:12-21; 148:12-149:3; 150:10-17; 154:20-155:6; 170:24-171:8; 171:19-172:13; 175:17-176:14	R F, R R R R R R R R R R R N/A N/A R R R	
183:9-15		183:16-17	N/A	
183:18-185:17				
185:18-25	EX			
186:1-6				
186:7-187:3				
187:4-188:14	AF, EX, L, LF, NA, O, P, PK, S			
188:25-191:20	AF, EX, LF NA, O, P, PK, S	188:23-24	N/A	
192:14-198:16	AF, EX, LF NA, O, P, PK, S			
198:22-199:13	H, LF, PK			
199:16-203:4	H, LF, PK			

Dated: January 27, 2023

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